

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ULYSSES RODRIGUEZ CHARLES

Plaintiff

v.

CITY OF BOSTON; JOHN MULLIGAN, in his  
individual capacity; WILLIAM KEOUGH, in his  
individual capacity; PAUL RUFO, in his individual  
capacity; KATHLEEN HANLEY JOHNSON, in her  
individual capacity; STANLEY BOGDAN, in his  
individual capacity; JOHN DOE and JANE DOE,  
supervisors in the Boston Police Department, in their  
individual capacity; CHARLES CAMPO, in his  
individual capacity; JOHN ZANINI, in his individual  
capacity; SUFFOLK COUNTY; and Suffolk county  
district attorney's office,

Defendants.  
\_\_\_\_\_

CA No. 04-10986 NG

**ASSENTED-TO AND/OR UNOPPOSED MOTION FOR LEAVE  
TO FILE PLAINTIFF'S OPPOSITION TO DEFENDANTS'  
MOTIONS TO DISMISS ON OR BEFORE DECEMBER 7, 2004**

Plaintiff Ulysses Rodriguez Charles hereby respectfully moves for leave to file his opposition to Defendants' motions to dismiss on or before December 7, 2004. As grounds for this motion, Mr. Charles states as follows:

1. Attorney Richard M. Egbert, counsel for Charles Campo, and Daniel I. Smulow, counsel for John Zanini and Suffolk County District Attorney's Office, assent to the request sought herein, and Attorney Amy E. Ambraik, counsel for Stanley Bogdan and the City of Boston, does not oppose it.

3. Counsel for Mr. Charles request the relief sought herein due to their heavy litigation calendar throughout the month of November and scheduling conflicts.

4. In addition, counsel for Mr. Charles request the additional time because three separate motions to dismiss Mr. Charles's Complaint have been filed, requiring the submission of three separate memoranda of law in opposition thereof.

WHEREFORE, Mr. Charles respectfully requests that the Court grant the relief sought herein.

Dated: November 3, 2004  
Boston, MA

Respectfully Submitted,

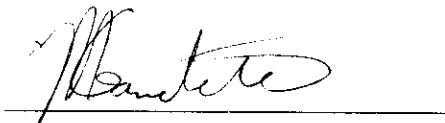


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Mayeti Gametchu (BBO# 647787)  
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Attorneys for Plaintiff  
ULYSSES RODRIGUEZ CHARLES

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to L.R. D.Mass. 7.1(A)(2), I, Mayeti Gametchu, hereby certify that on October 27, 2004, I conferred with counsel for Defendants Charles Campo, Stanley Bogdan, John Zanini and the Office of the District Attorney for Suffolk County. Counsel for Messrs. Campo, Zanini and the Office of the District Attorney assent to the relief sought in the instant motion. Counsel for Mr. Bogdan does not oppose it.



**CERTIFICATE OF SERVICE**

I, Mayeti Gametchu, hereby certify that, on November 3, 2004, I caused a true and correct copy of the foregoing document to be served by first class mail upon the persons listed below.

A handwritten signature in black ink, appearing to read 'Mayeti Gametchu', is written over a horizontal line.

Richard M. Egbert, Esq.  
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Boston, MA 02110

Attorney for Defendant  
CHARLES CAMPO

Amy E. Ambraik, Esq.  
Assistant Corporation Counsel  
City of Boston Law Department  
City Hall, Room 615  
Boston, MA 02201

Attorneys for Defendant  
STANLEY BOGDAN

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Assistant Attorney General  
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One Ashburton Place  
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Attorney for Defendants  
JOHN ZANINI and the  
OFFICE OF THE DISTRICT ATTORNEY  
FOR THE SUFFOLK DISTRICT